

Marc V. Kalagian
Attorney at Law: 4460
211 East Ocean Boulevard, Suite 420
Long Beach, CA 90802
Tel: (562)437-7006
Fax: (562)432-2935
E-Mail: rohlfig.kalagian@rksslaw.com
Attorneys for Plaintiff
TANIA V. REAL DE RAGAN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TANIA V. REAL DE RAGAN)	Case No.: 2:16-cv-02468-JAD-PAL
)	
Plaintiff,)	STIPULATION TO EXTEND TIME
v.)	TO FILE MOTION FOR REMAND
)	AND/OR REVERSAL
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security.)	(FIRST REQUEST)
)	
Defendant.)	
)	

Plaintiff Tania V. Real De Ragan (“Plaintiff”) and defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to April 5, 2017; and that Defendant shall have 30 days or until May 5, 2017, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due May 26, 2017.

1 An extension of time is needed in order to properly address the issues within
2 the administrative record in this matter. Counsel sincerely apologizes to the court
3 for any inconvenience this may have had upon it or its staff.

4
5 DATE: February 2, 2017

Respectfully submitted,

ROHLFING & KALAGIAN, LLP

6
7 /s/ *Marc V. Kalagian*

8 BY: _____

Marc V. Kalagian

Attorney for plaintiff Ms. Tania V. Real De Ragan

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10
11 DATE: February 2, 2017

Daniel G. Bogden

United States Attorney

12
13 /s/ *April A. Alongi*

14 BY: _____

April A. Alongi

Special Assistant United States Attorney

15 Attorneys for defendant Nancy A. Berryhill

16 |*authorized by e-mail|

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18
19 DATED: February 3, 2017

20 IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:16-CV-02468-JAD-PAL**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on February 2, 2017.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Marc V. Kalagian

Marc V. Kalagian
Attorneys for Plaintiff